Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	**) ET Docket No. 01-278**
Review of Part 15	**) RM-9375**
Of the Commission's Rules	**) RM-10051**

To: The Commission

REPLY COMMENTS FROM WARD WHEATON IN RESPONSE TO COMMENTS TO NOTICE OF PROPOSED RULE MAKING

I am an amateur radio operator I have been licensed for many years with call sign WQ6I. Pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. 1.415 I hereby respectfully submit my reply comments to the Comment to Notice of Proposed Rule Making.

Introduction

The Commission asked for reply comments on part 15 review including notice RM-10051. I am the trustee of an Amateur TV Repeater located high atop Little San Gorgonio Mountain at 9140 ft. elevation east of the greater Los Angeles California area. I am very concerned about Savi proposal indicated in RM-10051 it proposes to modify part 15 rules to greatly increase both the power and duration of devices in the 70 cm amateur band. Savi proposes a specific center frequency of 433.92 MHz. This places the proposed RFID tags co-channel with my repeater's input of 434 MHz. I wanted to add additional comments about the affect this proposal would have with amateur television.

Amateur Repeater Station Interference Potential

The repeater site has line of sight to most of the Los Angeles area including the harbor areas, the warehouse district near Ontario Airport and Palm Springs. The repeater has a very sensitive receiver with a 9 dB the receiver uses 434 MHz AM television. I am concerned about the misleading flawed engineering report Savi made in their recent

comments to the commission, this report indicated a signal level at 1 km that is clearly in dispute by at least 30 dB. The signal should be about -87 dBM at 1 km distance. With many businesses equipped with the proposed RFID the systems and thousands of boxes, crates and cargo containers within line of sight of the repeater, the combination would cause undesired interference. Savi's engineering study assumes only FM voice systems on 433.92 MHz and EME at 432 MHz is misleading. ATV is very common across the county using 434 MHz. I question why Savi chose to not study ATV interference issues. The ECS, RACES, and ARES groups in the area use the repeater to forward television to emergency operation centers from portable 434 MHz ATV stations for damage assessment and live events. Should the Commission approve RM-10051 as is would greatly reduce the ability of the repeater to be used in emergencies.

434 MHz Amateur TV Stations Will Cause RFID Tags to Stop Operating

ATV stations run more power than the proposed RFID tags and base stations use directional gain antennas. About 90 ATV stations are within my coverage area and when they transmit they would halt communications between the tags and interrogation units. This doesn't make a good business model for efficient shipment of goods. A review of the American Radio Relay League's (ARRL) Repeater Directory in the Amateur Television section for each state would show a significant number of ATV repeaters with 434 MHz inputs and areas using 434 MHz for simplex ATV communications.

Conclusions

The idea of improvements in RFID tags and range of operation would help shipping and warehouse operations, the 425-435 MHz part 15 band is not the place to place higher power and duration part 15 devices. I agree with the ARRL's engineering study and ex-parte showing to the Commission, they have a top notch engineering teem. The 915 MHz band would work with out having to change the rules. The 390 MHz (garage door openers) band would have a lot less congestion than 433.92 MHz and not cause interference to amateurs and amateurs blocking communications to the RFID tags.

Respectfully submitted,

Moody Law WQ6I
1384 Oxford
Claremont, CA 91711

March 10, 2002